

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X  
IN RE PROPECIA (FINASTERIDE) :  
PRODUCT LIABILITY LITIGATION :  
----- :

THIS DOCUMENT APPLIES TO: :

PAUL DAWSON, :

Plaintiff, :

v. :

MERCK & CO., INC. and MERCK SHARP & :  
DOHME CORP., :

Defendants. :  
----- X

Master File No.: 12-md-2331 (BMC)(PK)

Case No.: 1:12-cv-01876 (BMC)(PK)

**NOTICE OF MOTION TO INTERVENE AND UNSEAL**

**PLEASE TAKE NOTICE** that upon the annexed memorandum of law in support of proposed intervenor Reuters America LLC's ("Reuters") Motion to Intervene and Unseal dated September 12, 2019, the Declaration of Katherine M. Bolger, all exhibits attached thereto, and all prior papers and proceedings in this action, Reuters moves to intervene and for an order removing the redactions from Plaintiff Paul Dawson's Response in Opposition to Merck's Motion *in Limine* (Docket Entry No. 113), unsealing the corresponding sealed exhibits (Docket Entry No. 115), and granting such other and further relief as this Court deems just and proper.

Dated: September 12, 2019  
New York, New York

Respectfully Submitted,

/s/ Katherine M. Bolger

Katherine M. Bolger  
DAVIS WRIGHT TREMAINE LLP  
1251 Avenue of the Americas, 21st Floor  
New York, New York 10020

*Attorney for Movant/Intervenor Reuters  
America LLC*